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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 17-058

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]**

#### **1. Statutory Authority**

Under the plain language analysis, the Board states that the proposed rule revises the license renewal deadline under s. Chir 3.02 (1) (intro.) from December 31 to December 14 to align with the renewal date under s. 440.08 (2) (a), Stats. However, under s. 440.08 (2) (a) 24., Stats., the renewal date for a chiropractor is December 15 of each even-numbered year, not December 14. Accordingly, it would appear that revising the date in the proposed rule from December 14 to December 15 would better align with the renewal date under s. 440.08 (2) (a) 24., Stats. For a comparison, it appears that other medical professions use the precise date reflected in s. 440.08 (2) (a), Stats., not the day before the date listed in that statute. See, for example, ss. DE 2.03 (1), DI 4.01 (1), Opt 7.03, and PT 8.02.

#### **2. Form, Style and Placement in Administrative Code**

In the rule summary’s listing of statutes interpreted in the proposed rule, the citation to s. 440.08 (2) (a), Stats., could more precisely cite to subd. 24. of that provision.